

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

In re:

EAGLE PROPERTIES AND
INVESTMENTS LLC

Debtor.

Case No. 23-10566-KHK
Chapter 7

**RESPONSE TO CHAPTER 7 TRUSTEE’S MOTION TO APPROVE SALE OF
2565 (F) AND 2567 (E) CHAIN BRIDGE ROAD, VIENNA, VA FREE AND CLEAR OF
LIENS, CLAIMS AND INTERESTS PURSUANT TO 11 U.S.C. §§ 363(f)**

LINKBANK, s/b/m to Virginia Partners Bank (“**LINKBANK**”), by counsel, hereby files this response to the Chapter 7 Trustee’s Motion to Approve Sale of 2565 (F) and 2567 (E) Chain Bridge Road, Vienna, VA Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. §§ 363(f) (the “**Motion**”), Docket No. 492, and in support thereof states as follows:

1. On August 25, 2020, Eagle Properties and Investments LLC (the “**Debtor**”) executed a Commercial Promissory Note in the original principal amount of \$704,000.00 (the “**Note**”), payable to Virginia Partners Bank, LINKBANK’s predecessor in interest. A copy of the Note is attached as **Exhibit A**.

2. On August 25, 2020, the Debtor also executed a Commercial Real Estate Deed of Trust (the “**Deed of Trust**”). A copy of the Deed of Trust is attached as **Exhibit B**. The Deed of Trust pledges, as security for the Note, the properties located at 2565 (F) and 2567 (E) Chain Bridge Road, Vienna, VA (the “**Properties**”).

3. The balance due under the Note as of April 30, 2024, was \$692,569.98, with \$76.40897 accruing *per diem*.

4. LINKBANK consents to entry of an order approving the Motion so long as the order provides that LINKBANK shall be paid the full amount of the debt owed under the Note upon the sale of the Properties, or otherwise consents in writing to a discounted payoff.

Respectfully submitted,

LINKBANK,
s/b/m to Virginia Partners Bank
By Counsel

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CERTIFICATE OF SERVICE

I certify that on June 25, 2024, the foregoing Response to Chapter 7 Trustee's Motion to Approve Sale of 2565 (F) and 2567 (E) Chain Bridge Road, Vienna, VA Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. §§ 363(f) was served electronically via the CM/ECF system on the following:

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